

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

In re:)	
)	Case No. 09-11586
Lyle Wade Wilkinson)	Chapter 13
Amanda Ann Wilkinson)	
)	
Debtor.)	

MOTION TO INCREASE CHAPTER 13 PLAN BASE

COMES NOW Debtors Lyle and Amanda Wilkinson, by and through their attorney, John A. Loesel of Lichtenegger, Weiss & Fetterhoff, LLC, and for their Motion to Increase Chapter 13 Plan Base state as follows:

1. Debtors filed for relief under the U.S. Bankruptcy Code on December 1, 2009.
2. Debtors plan was confirmed June 15, 2010 with a plan base of \$37,022.00.
3. Debtors request to increase their Chapter 13 Plan base to \$56,622.00 to allow the feasibility of the plan.

WHEREFORE, Debtors pray this Honorable Court enter an Order increasing their plan base to \$56,622.00 to allow the feasibility of the plan.

Respectfully submitted,

/s/ John A. Loesel
John A. Loesel, MO ED #63041
Lichtenegger Law Firm
2480 East Main Street
Jackson, Missouri 63755
Ph: 573-243-8463
Fx: 573-243-3946
johnloesel@semolawfirm.com
ATTORNEYS FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2015, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system and/or was mailed by U.S. Postal Service to the following:

John LaBarge, Jr.
PO box 430908
St. Louis, MO 63143

/s/ Heather J. Greable
Heather J. Greable
Lichtenegger, Weiss & Fetterhoff, LLC